

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GREGORY DONNELLY
PETITIONER,

CIVIL ACTION

V.

BERNARD BRADY, SUPERINTENDENT
OLD COLONY CORRECTION CENTER
RESPONDENT,

NO-04-12706-R VZ

PETITIONER'S MOTION TO FURTHER ENLARGE THE

NOW COMES THE PETITIONER, GREGORY DONNELLY, ACTING PRO. SE, IN THE ABOVE ENTITLED CASE, AND RESPECTFULLY MOVES THIS HONORABLE COURT, PURSUANT TO RULE 6(b)(1-2), FED. R. CIVIL P., TO ENLARGE THE TIME WITHIN WHICH TO RESPOND TO THE RESPONDENT'S SUPPLEMENTARY BRIEF FILED BY THE RESPONDENT ON AUGUST 26, 2005.

AS GROUNDS THEREFORE, MOVANT STATES THAT HE IS PRO SE, WORKING WITHOUT ADEQUATE LAW LIBRARY FACILITIES TO WHICH MOVANT IS FORCED TO SEEK LEGAL ASSISTANCE FROM OUTSIDE

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THE JAIL SYSTEM. THIS PETITIONER RELIES ON THE U.S. POSTAL SERVICE TO RECEIVE ANY AND ALL LEGAL RESEARCH / WRITINGS FROM LEGAL ADVOCATE ASSISTING HIM IN THIS CASE. MOVANT IS NOW WAITING ON THE ASSISTANCE HE REQUESTED IN PREPARING AND FILING HIS RESPONSE TO RESPONDENT'S SUPPLEMENTARY BRIEF.

WHEREFORE, IT IS RESPECTFULLY PRAYED THIS HONORABLE COURT GRANT THIS MOTION TO ENLARGE TIME FOR AN ADDITIONAL 10 DAY OR OCT. 7, 2005 TO REPLY TO ~~RESPOND~~ IT FOR REASONS SET FORTH HEREIN, OR FOR ANY, AND ALL OTHER REASONS THIS COURT MAY DEEM JUST IN THE PREMISES.

SEPTEMBER 23, 2005

RESPECTFULLY SUBMITTED

Gregory Donnelly

GREGORY DONNELLY, PRO. E.
PETITIONER

269 TREBLE COVE RD

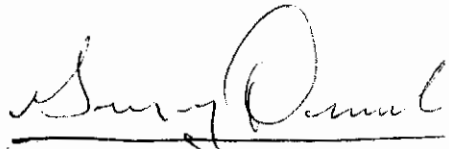
BILLERICA, MA. 01862

CERTIFICATE OF SERVICE

I GREGORY DONNELLY, DO HEREBY CERTIFY THAT I HAVE SERVED A COPY OF THE ABOVE PLEADING TO THE ATTORNEY FOR THE RESPONDENT, BY PLACING SAID IN THE INSTITUTIONAL MAIL BOX, POSTAGE PAID FIRST CLASS, ADDRESS >

RANDALL RAVITZ,
ASS. ATT. GENERAL
CRIMINAL BUREAU
ONE ASHBURTON PLACE
BOSTON, MA. 02108

DATED SEPTEMBER 23, 2005


GREGORY DONNELLY, I, SE.
PETITIONER
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BILLERICA, MA. 018 2